

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RAJAN PATEL,)	
)	
Plaintiff,)	Civil Action No. 2:21-cv-00546
)	
v.)	
)	Hon. Nitza I. Quiñones-Alejandro
ECFMG,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR RECONSIDERATION AND
TO DISMISS PLAINTIFF’S AMENDED COMPLAINT**

For the reasons set forth in the attached memorandum of law, Defendant ECFMG,¹ by and through its undersigned counsel, moves (1) for reconsideration of the Order filed June 22, 2023 (ECF 49) directing ECFMG to answer Plaintiff’s Amended Complaint (ECF 25), and (2) to dismiss Plaintiff’s Amended Complaint (ECF 25) pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: July 5, 2023

/s/ Elisa P. McEnroe
Elisa P. McEnroe, PA Bar No. 206143
Max O. Bernstein, PA Bar No. 325405
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: +1.215.963.5917
Facsimile: +1.215.963.5001
elisa.mcenroe@morganlewis.com
max.bernstein@morganlewis.com

Attorneys for Defendant ECFMG

¹ Unrelated to this litigation, ECFMG has filed restated articles of incorporation in which its name changed to “Intealth.” For ease of reference, Defendant will refer to itself as “ECFMG” for the purposes of this Motion.

CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via the ECF system and email upon:

Rajan Patel
8701 Deanne Dr.
Gaithersburg, MD 20882
drpat108@gmail.com

Plaintiff

DATED: July 5, 2023

/s/ Elisa P. McEnroe
Elisa P. McEnroe